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*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case) (Jointly Administered)

**STIPULATION BETWEEN DEBTORS  
AND OFFICIAL COMMITTEE OF TORT  
CLAIMANTS EXTENDING TIME FOR  
DEBTORS TO RESPOND TO MOTION  
OF OFFICIAL COMMITTEE OF TORT  
CLAIMANTS FOR ORDER DIRECTING  
DEBTORS TO SUPPLEMENT  
SCHEDULES**

Re: Dkt. Nos. 2964

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Official Committee  
4 of Tort Claimants (the “**Tort Claimants Committee**”), on the other. The Debtors and the Tort  
5 Claimants Committee are referred to in this Stipulation and Agreement for Order collectively as  
6 the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On July 12, 2019, the Tort Claimants Committee filed the *Motion of the Official*  
9 *Committee of Tort Claimants for Order Directing Debtors to Supplement Schedules* [Dkt. No.  
10 2964] (the “**TCC Schedules Motion**”) which is set for a hearing before the Court at 9:30 a.m. on  
11 August 13, 2019. Any response or opposition to the TCC Schedules Motion is due by 4:00 p.m.  
12 (Pacific Time) on July 30, 2019.

13 B. Counsel for the Debtors has requested, and counsel for the Tort Claimants  
14 Committee has agreed, that the time for the Debtors to respond to the TCC Schedules Motion be  
15 extended.

16 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
17 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
18 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
19 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
20 **THAT:**

21 1. The time for the Debtors to file and serve any response or opposition to the  
22 TCC Schedules Motion is extended through 4:00 p.m. (Pacific Time) on August 7, 2019.

23 *[Signatures on next page]*  
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Dated: July 25, 2019

KELLER & BENVENUTTI LLP

/s/ Thomas B. Rupp

Thomas B. Rupp

*Attorneys for Debtors  
and Debtors in Possession*

Dated: July 25, 2019

BAKER & HOSTETLER LLP

/s/ Cecily A. Dumas

Cecily A. Dumas

*Attorneys for Official Committee of Tort  
Claimants*